

7/5/22, 9:54 AM

Seventh Circuit Court District-Docket Report

**Mississippi Electronic Courts**  
**Seventh Circuit Court District (Hinds Circuit Court - Jackson)**  
**CIVIL DOCKET FOR CASE #: 25CI1:22-cv-00297-WLK**

HEAD v. NOTZ et al  
Assigned to: Winston L Kidd

**Upcoming Settings:**

None Found

Date Filed: 05/16/2022  
Current Days Pending: 50  
Total Case Age: 50  
Jury Demand: None  
Nature of Suit: Negligence - Motor Vehicle  
(182)

**Plaintiff****DONNA HEAD**

represented by **Samuel F. Creasey**  
**MORGAN & MORGAN, PLLC**  
4450 Old Canton Road  
Suite 200  
JACKSON, MS 39211  
601-718-0917  
Fax: 601-718-2094  
Email: screasey@forthepeople.com  
**ATTORNEY TO BE NOTICED**

FILE

V.

**Defendant****JAY R. NOTZ****Defendant****NELSON FREIGHT SERVICE****Defendant****JOHN DOES**

1-10

Date Filed	#	Docket Text
05/16/2022	<u>2</u>	COMPLAINT against JOHN DOES, NELSON FREIGHT SERVICE, JAY R. NOTZ, filed by DONNA HEAD. (Attachments: # <u>1</u> Civil Cover Sheet,) (LM) (Entered: 05/16/2022)
05/16/2022	<u>3</u>	SUMMONS Issued to NELSON FREIGHT SERVICE. (LM) (Entered: 05/16/2022)
05/16/2022	<u>4</u>	SUMMONS Issued to JAY R. NOTZ. (LM) (Entered: 05/16/2022)

<b>MEC Service Center</b>
<b>Transaction Receipt</b>
07/05/2022 09:54:32

**EXHIBIT A**

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**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI  
FIRST JUDICIAL DISTRICT**

**DONNA HEAD**

**PLAINTIFF**

**VS.**

**CASE NO: 22-297**

**JAY R. NOTZ; NELSON FREIGHT SERVICE, INC.;  
AND JOHN DOES 1-10**

**DEFENDANTS**

**COMPLAINT WITH DISCOVERY ATTACHED  
(JURY TRIAL DEMANDED)**

COMES NOW, Plaintiff, Donna Head (hereafter "Plaintiff"), by and through undersigned counsel of record and files this Complaint against and for cause would show unto this Honorable Court the following, to wit:

**PARTIES**

1. Plaintiff, Donna Head, is an adult resident of Warren County, Mississippi who resides at 1105 Riverbend Road in Vicksburg, Mississippi.
2. Defendant Jay R. Notz (hereafter "Defendant Notz") is an adult resident citizen of Michigan and may be served with process at his resident address N15119 McClellan Ally in Amberg, Michigan 34102 or wherever he may be found or may be served by any manner allowed by Mississippi law.
3. Defendant Nelson Freight Service, Inc. (hereafter "Defendant Nelson Freight") is a foreign corporation organized under the laws of a state other than Mississippi but is doing business in the State of Mississippi and may be served with Complaint by serving its Registered Agent, Edward Jardenowski, 152 N Emery Avenue, Peshtigo, Wisconsin

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54157 and/or being served under any method allowable under Mississippi Rules of Civil Procedure and/or applicable Mississippi Law.

4. Defendants, John Does 1-10, are believed to be corporations, entities, or individuals whose negligence, or the negligence of their employees or agents, caused or contributed to Plaintiff's injuries and/or damages as described herein. The identities of Defendants John Does 1-10 are unknown to Plaintiff at the present time. Plaintiff should be allowed to amend this complaint to designate as defendants such corporations, entities, or individuals at a time when said proper identities may be ascertained by them and they hereby respectfully request leave of the Court to do so, pursuant to Mississippi Rules of Civil Procedure.

#### JURISDICTION AND VENUE

5. The First Judicial District Circuit Court of Hinds County, Mississippi has jurisdiction over the subject matter of this action since this action arises out of the negligent acts or omissions committed in the State of Mississippi.
6. Venue is proper in the First Judicial District of Hinds County Circuit Court pursuant to Mississippi Code § 11-11-3 as the subject incident occurred in Hinds County.

#### FACTS

7. Plaintiff adopts and alleges the allegations contained in paragraphs 1 through 6 of this Complaint as if fully set out herein.
8. On March 21, 2021, the Plaintiff was operating a vehicle westbound on I-20 in the left lane near the I-20/I-55 split in Hinds County, Mississippi.

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9. The Defendant Notz was driving his vehicle, while was in the course and scope of his employment with the Defendant Nelson Freight, west on I-20 in the right lane near the I-20/I-55 split in the same area and at the same time as Plaintiff.
10. The Defendant Notz attempted to change lanes into the lane of travel of Plaintiff and collided with the passenger side of Plaintiff's vehicle.
11. The Defendant Nelson Freight's employee, Defendant Notz, was in the course and scope of his employment with the Defendant Nelson Freight at the time of the accident and as a result, Defendant Nelson Freight is liable for any and all negligent acts of their employee.
12. The collision was caused by the recklessness, carelessness, and/or negligence of the Defendant Notz while in the course and scope of employment for Defendant Nelson Freight. for that among other acts, the Defendants:
  - a) Failed to observe due care and precaution and maintain proper and adequate control of his motor vehicle;
  - b) Failed to keep a proper lookout for the vehicles lawfully upon the property;
  - c) Failed to exercise reasonable care in the operation of the motor vehicle he was operating under the circumstances then and there existing at the time of the subject incident;
  - d) Committed other acts of negligence that will be proven at the trial of this cause.
13. As a proximate result of said collision and Defendants negligent acts, the Plaintiff was seen by several medical providers for treatment of the injuries she received in the above referenced collision.
14. As a direct and proximate result of the negligence of the Defendants, as set forth above, the Plaintiff sustained damages that may include, but are not necessarily limited to

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serious physical injuries; past, present and future pain and suffering; past, present, and future emotional distress; past, present and future medical expenses; past, present and future lost wages and/or lost earning capacity and other damages that will be proved at the trial of this matter.

15. Defendant Notz, while in the course and scope of his employment and/or agency with Defendant Nelson Freight, negligently failed to safely operate his vehicle on March 21, 2021, which proximately caused the resultant collision and injuries to the Plaintiff.

16. Defendant Nelson Freight is liable as a result of their relationship with Defendant Notz via respondeat superior and vicarious liability but also, are negligent and liable for their own independent negligence, including, but not limited to negligent entrustment, negligent hiring, negligent training, negligent supervision, and negligent inspection and maintenance of the vehicle.

**COUNT ONE: NEGLIGENCE**

17. Plaintiff adopts and alleges the allegations contained in paragraphs 1 through 16 of this Complaint as if fully set out herein.

18. Defendant Notz, while in the course and scope of his employment with Defendant Nelson Freight, negligently failed to safely operate his vehicle on March 21, 2021, which proximately caused the resultant collision and injuries to the Plaintiff.

19. For the above-referenced negligence, Plaintiff is entitled to damages.

**COUNT TWO: GROSS NEGLIGENCE**

20. Plaintiff adopts and alleges the allegations contained in paragraphs 1 through 19 of this Complaint as if fully set out herein.

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21. At the time of the collision made the basis of this suit, Defendant Brown and Socrates acted wantonly and in reckless disregard for the safety and welfare of other persons in that they:

- a. in reckless disregard for the safety and welfare of others, carelessly ignored their surroundings and thereby intentionally causing the aforementioned damages to the Plaintiff which were the reasonably foreseeable consequences of their wanton, reckless or intentional misconduct;
- b. engaged in such other and further acts of wanton, reckless or intentional wrongdoing as subsequent discovery may reveal;

22. Said conduct was willful, wanton and grossly negligent and exhibited reckless disregard for the rights and safety of Plaintiff so as to give rise to an award of punitive damages.


23. As a result of the negligence of Defendant Brown and Defendant Socrates, Plaintiff Gwendolyn Anderson suffered damages, including but not limited to, past pain, suffering and mental anguish, accrued medical expenses, lost earnings, loss of household services and other changes to be proven at trial.

#### **PRAYER FOR RELIEF**

WHEREFORE, PREMISES CONSIDERED, the Plaintiff requests a trial by jury and demands including actual, compensatory, consequential, and incidental damages, for physical injuries; past, present and future physical and emotional pain and suffering, past, present and future medical expenses; and any other special damages that may be incurred by the Plaintiff, together with attorney's fees, costs of suit and any further relief as the court may deem proper not exceed the jurisdictional limits of this Court.

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**RESPECTFULLY** submitted this 7<sup>th</sup> day of April, 2022.

  
\_\_\_\_\_  
Samuel F. Creasey, Esq.

**OF COUNSEL:**

Samuel F. Creasey, Esq. (MSB No. 99555)  
MORGAN & MORGAN, PLLC  
4450 Old Canton Road, Suite 200  
Jackson, Mississippi 39211  
Telephone: (601) 949-3388  
Facsimile: (601) 718-2094  
Email: [screasey@forthepeople.com](mailto:screasey@forthepeople.com)

<b>COVER SHEET</b> Case: 25CH-22-cv-00297 <b>Civil Case Filing Form</b> (To be completed by Attorney/Party Prior to Filing of Pleading)		Court Identification Docket # <u>25</u> <u>1</u> <u>CH</u> County # <u>05</u> Judicial District <u>16</u> Court ID <u>22</u> (CH, CI, CO) Month <u>05</u> Date <u>16</u> Year <u>22</u>		Case Year <u>2022</u> Filed: <u>06/16/2022</u> Page: <u>2</u> of <u>2</u> Docket Number <u>25-1-CH-051622-2</u> Local Docket ID <u>051622</u>	
Mississippi Supreme Court Administrative Office of Courts		Form AOC/D1 (Rev 2020)		This area to be completed by clerk	
In the CIRCUIT		Court of <u>HINDS</u>		County <u>FIRST</u> Judicial District	
Origin of Suit (Place an "X" in one box only) <input checked="" type="checkbox"/> Initial Filing <input type="checkbox"/> Reinstated <input type="checkbox"/> Foreign Judgment Enrolled <input type="checkbox"/> Transfer from Other court <input type="checkbox"/> Other <input type="checkbox"/> Remanded <input type="checkbox"/> Reopened <input type="checkbox"/> Joining Suit/Action <input type="checkbox"/> Appeal					
<b>Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form</b> <b>Individual Head</b> <u>Donna</u> Last Name <u>Donna</u> First Name <u>Donna</u> Maiden Name, if applicable _____ M.I. _____ Jr/Sr/III/IV _____ Check ( x ) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____ Estate of _____ Check ( x ) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____ D/B/A or Agency _____					
<b>Business</b> Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated _____ Check ( x ) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: _____ D/B/A _____					
Address of Plaintiff <u>1105 River Bend Rd Vicksburg, MS 39183</u> Attorney (Name & Address) <u>Sam Creasey, 4450 Old Canton Rd., Suite 200, Jackson, MS 39211</u> MS Bar No. <u>99555</u> Check ( x ) if Individual Filing Initial Pleading is NOT an attorney _____ Signature of Individual Filing: _____					
<b>Defendant - Name of Defendant - Enter Additional Defendants on Separate Form</b> <b>Individual</b> <u>Notz</u> <u>Jay</u> Last Name <u>Notz</u> First Name <u>Jay</u> Maiden Name, if applicable _____ M.I. _____ Jr/Sr/III/IV _____ Check ( x ) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____ Estate of _____ Check ( x ) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____ D/B/A or Agency _____					
<b>Business</b> Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated _____ Check ( x ) if Business Defendant is acting in the name of an entity other than the above, and enter below: _____ D/B/A _____					
Attorney (Name & Address) - If Known _____ MS Bar No. _____					
Check ( x ) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet					
<b>Nature of Suit (Place an "X" in one box only)</b>					
<b>Domestic Relations</b> <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Diff <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Term. of Parental Rights-Chancery <input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA) <input type="checkbox"/> Other _____		<b>Business/Commercial</b> <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____		<input type="checkbox"/> Alcohol/Drug Commitment (voluntary) <input type="checkbox"/> Other _____ <b>Children/Minors - Non-Domestic</b> <input type="checkbox"/> Adoption - Contested <input type="checkbox"/> Adoption - Uncontested <input type="checkbox"/> Consent to Abortion <input type="checkbox"/> Minor Removal of Minority <input type="checkbox"/> Other _____ <b>Civil Rights</b> <input type="checkbox"/> Elections <input type="checkbox"/> Expungement <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief/Prisoner <input type="checkbox"/> Other _____ <b>Contract</b> <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____ <b>Statutes/Rules</b> <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____	
<b>Appeals</b> <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Dept Employment Security <input type="checkbox"/> Municipal Court <input type="checkbox"/> Other _____		<b>Probate</b> <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Mental Health Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Joint Conservatorship & Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Alcohol/Drug Commitment (involuntary)		<b>Real Property</b> <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale: Confirm/Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____ <b>Torts</b> <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Intentional Tort <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input type="checkbox"/> Negligence - General <input checked="" type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____	



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 IN THE CIRCUIT ☒ COURT OF HINDS ☒ COUNTY, MISSISSIPPI

FIRST ☒ JUDICIAL DISTRICT, CITY OF \_\_\_\_\_

Docket No. 22 - 297 Docket No. If Filed  
 File Yr Chronological No. Clerk's Local ID Prior to 1/1/94 \_\_\_\_\_

**DEFENDANTS IN REFERENCED CAUSE - Page 1 of \_\_\_\_\_ Defendants Pages**  
**IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

**Defendant #2:**

**Individual:** \_\_\_\_\_ ( \_\_\_\_\_ ) \_\_\_\_\_  
 Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

**Business** Nelson Freight Service INC  
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

**ATTORNEY FOR THIS DEFENDANT:** \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**Defendant #3:**

**Individual:** \_\_\_\_\_ ( \_\_\_\_\_ ) \_\_\_\_\_  
 Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

**Business** \_\_\_\_\_  
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

**ATTORNEY FOR THIS DEFENDANT:** \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**Defendant #4:**

**Individual:** \_\_\_\_\_ ( \_\_\_\_\_ ) \_\_\_\_\_  
 Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

**Business** \_\_\_\_\_  
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:  
 D/B/A \_\_\_\_\_

**ATTORNEY FOR THIS DEFENDANT:** \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Case: 25CI1:22-cv-00297-WLK Document #: 3 Filed: 05/16/2022 Page 1 of 1

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI  
FIRST JUDICIAL DISTRICT

DONNA HEAD

PLAINTIFFS

VS.

JAY R. NOTZ; NELSON  
FREIGHT SERVICE, INC.;  
AND JOHN DOES 1-10

CIVIL ACTION NO. 22-297

DEFENDANTS

SUMMONS

STATE OF MISSISSIPPI  
COUNTY OF

TO: Nelson Freight Service, Inc  
152 N Emery Avenue  
Peshtigo, Wisconsin 54157

OR Wherever he may be found

NOTICE TO DEFENDANT

THE COMPLAINT AND DISCOVERY WHICH IS ATTACHED TO THIS SUMMONS IS  
IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Samuel F. Creasey attorney for the Plaintiff, whose address is 4450 Old Canton Rd., Suite 200, Jackson, Mississippi 39211. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this Summons and Complaint or a judgment by default will be entered against you for the money or other things demanded in the Complaint. Your written responses to the discovery which is simultaneously being served with the Complaint must be mailed or delivered within forty five (45) days from the date of delivery of this Summons and Complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the Seal of said Court this 16 day of May, 2022.



ZACK WALLACE, CIRCUIT CLERK OF  
HINDS COUNTY

By: L.M.J., D.C.

SAMUEL F. CREASEY, (MSB #99353)  
Morgan & Morgan, P.A.  
4450 Old Canton Rd, Suite 200  
Jackson, MS 39211  
Telephone: (601) 718-0917  
Facsimile: (601) 718-2094  
[screasey@forthepeople.com](mailto:screasey@forthepeople.com)  
Attorney for the Plaintiff

Case: 25CI1:22-cv-00297-WLK Document #: 4 Filed: 05/16/2022 Page 1 of 1

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI  
FIRST JUDICIAL DISTRICT

DONNA HEAD

PLAINTIFFS

VS.

JAY R. NOTZ; NELSON  
FREIGHT SERVICE, INC.;  
AND JOHN DOES 1-10

CIVIL ACTION NO. 22-297

DEFENDANTS

SUMMONS

STATE OF MISSISSIPPI  
COUNTY OF

TO: Jay R. Notz  
N15119 McClellan Ally  
Amberg, Michigan 34102

OR Wherever he may be found

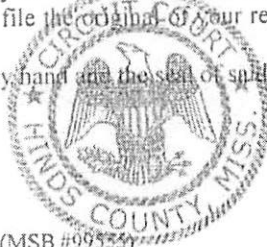
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You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court this 16 day of May, 2022.



ZACK WALLACE, CIRCUIT CLERK OF  
HINDS COUNTY

By: h. mjt, D.C.

SAMUEL F. CREASEY, (MSB #99535)  
Morgan & Morgan, P.A.  
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[screasey@forthepeople.com](mailto:screasey@forthepeople.com)  
Attorney for the Plaintiff